

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker
-----X		

**STIPULATION BY AND BETWEEN THE CITY OF DETROIT,
MICHIGAN AND JEROME COLLINS FOR THE ENTRY OF AN ORDER
(1) WITHDRAWING MOTION FILED BY THE CITY OF DETROIT AT
DOCKET NUMBER 10030 WITHOUT PREJUDICE; (2) VACATING THE
ORDER ENTERED AT DOCKET NUMBER 10094 GRANTING CITY OF
DETROIT’S MOTION; AND (3) PERMITTING THE CITY OF DETROIT
TO FILE A NEW MOTION SEEKING, AMONG OTHER THINGS, TO
ENFORCE THE CITY OF DETROIT’S CONFIRMED PLAN AGAINST
JEROME COLLINS**

The City of Detroit, Michigan (“City”) and Jerome Collins (“Collins,” and together with the City, the “Parties”), file this *Stipulation by and Between the City of Detroit, Michigan and Jerome Collins for the Entry of an Order (1) Withdrawing Motion filed by the City of Detroit at Docket Number 10030 Without Prejudice; (2) Vacating the Order Entered at Docket Number 10094 Granting City of Detroit’s Motion; and (3) Permitting the City of Detroit to File a New Motion Seeking, Among Other Things, To Enforce the City of Detroit’s Confirmed Plan Against Jerome Collins.*

WHEREAS, on July 8, 2015, the City filed the *City of Detroit's Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring the Dismissal with Prejudice of the Federal Court Action Filed by Jerome Collins to the Extent It Seeks Relief Against the City of Detroit or Property of the City of Detroit* ("Motion," Doc. No. 10030);

WHEREAS, on July 28, 2015, the City filed a Certificate of No Response with respect to the Motion and the Court entered an order granting it ("Order," Doc. No. 10094);

NOW, THEREFORE, the Parties stipulate and agree as follows:

1. The Motion is withdrawn without prejudice.
2. The Order is vacated.
3. The City may file a new motion seeking, among other things, to enforce the City of Detroit's Eighth Amended Plan for the Adjustment of Debts of the City of Detroit against Jerome Collins.

STIPULATED AND AGREED:

ATTORNEYS FOR THE CITY	ATTORNEYS FOR JEROME COLLINS
By: <u>/s/ Marc N. Swanson</u> Jonathan S. Green (P33140) Marc N. Swanson (P71149) Ronald A. Spinner (P73198) MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 swansonm@millercanfield.com spinner@millercanfield.com	By: <u>/s/ Benjamin Whitfield, Jr.</u> Benjamin Whitfield, Jr., Esq. (P23562) Cynthia J. Gaither, Esq. (P40755) BENJAMIN WHITFIELD, JR. & ASSOCIATES, P.C. 547 East Jefferson Ave Detroit, Michigan 48226 Telephone: (313) 961-1000 Facsimile: (313) 961-3110 benwlaw123@aol.com benwlaw4822@aol.com

DATED: August 11, 2015

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker
-----X		

**ORDER GRANTING STIPULATION BY AND BETWEEN THE CITY OF
DETROIT, MICHIGAN AND JEROME COLLINS FOR THE ENTRY OF
AN ORDER (1) WITHDRAWING MOTION FILED BY THE CITY OF
DETROIT AT DOCKET NUMBER 10030 WITHOUT PREJUDICE; (2)
VACATING THE ORDER ENTERED AT DOCKET NUMBER 10094
GRANTING CITY OF DETROIT’S MOTION; AND (3) PERMITTING
THE CITY OF DETROIT TO FILE A NEW MOTION SEEKING, AMONG
OTHER THINGS, TO ENFORCE THE CITY OF DETROIT’S
CONFIRMED PLAN AGAINST JEROME COLLINS**

Upon the Stipulation by and Between the City of Detroit, Michigan and
Jerome Collins for the Entry of an Order (1) Withdrawing Motion filed by the City
of Detroit at Docket Number 10030 Without Prejudice; (2) Vacating the Order
Entered at Docket Number 10094 Granting City of Detroit’s Motion; and (3)
Permitting the City of Detroit to File a New Motion Seeking, Among Other
Things, To Enforce the City of Detroit’s Confirmed Plan Against Jerome Collins;
and the Court being otherwise advised in the premises;

IT IS ORDERED THAT:

1. The City of Detroit's Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring the Dismissal with Prejudice of the Federal Court Action Filed by Jerome Collins to the Extent It Seeks Relief Against the City of Detroit or Property of the City of Detroit filed at Docket Number 10030 is withdrawn without prejudice.

2. The Court's order entered at Docket Number 10094 is vacated.

3. The City may file a new motion seeking, among other things, to enforce the City of Detroit's Eighth Amended Plan for the Adjustment of Debts of the City of Detroit against Jerome Collins.